

**Gregg, Arthur**

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**From:** Steve Clark  
**Sent:** Monday, April 11, 2016 6:37 PM  
**To:** Ed Martin; aschlafly@aol.com  
**Cc:** Joel Rohlf  
**Subject:** FW: Notification

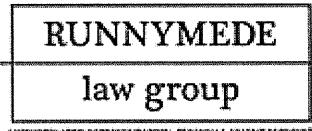
See Eunie's email below. I will not respond or even acknowledge receipt until we determine our strategy for litigation. I'm inclined to have the suit styled as Phyllis, Andy and John (and LaNeil and Kathleen) v. Anne Cori and her group.

Also, does John have a \*non\* Eagle Forum email address? We should not use the Eagle Forum emails in case the Cori group gets control of the servers.

Steve

**Stephen R. Clark**  
Managing Partner  
RUNNYMEDE law group  
7733 Forsyth Blvd. Suite 625  
St. Louis, MO 63105  
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Click here to add [Steve Clark's business card](#) to your address book.

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**From:** Eunie Smith [mailto:[alaeagle@charter.net](mailto:alaeagle@charter.net)]  
**Sent:** Monday, April 11, 2016 6:25 PM  
**To:** Steve Clark  
**Subject:** Notification

4200 Stone River Circle  
Birmingham, Alabama 35213

April 11, 2016

Stephen R. Clark  
Runnymede Law Group

Dear Mr. Clark:

At the meeting held on April 11, 2016, a majority of the Board of Directors of Eagle Forum voted to adopt a resolution confirming that Eagle Forum has not acted to appoint legal counsel to represent it. At this time, neither the Runnymede Law Group nor any other law firm has been engaged to represent Eagle Forum.

Please be advised that neither you nor your firm, Runnymede Law Group, is authorized to represent Eagle Forum as its legal counsel. Accordingly, you should refrain from holding yourself as legal counsel to Eagle Forum, effective immediately.

Sincerely,

Eunie Smith  
First Vice President

Eunie Smith, President  
Eagle Forum of Alabama  
[alaeagle@charter.net](mailto:alaeagle@charter.net)  
(205)879-7096

**Gregg, Arthur**

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**From:** Steve Clark  
**Sent:** Saturday, April 30, 2016 9:21 AM  
**To:** Phyllis Schlafly (pschlafly@charter.net); Ed Martin; aschlafly@aol.com; johnschlafly@gmail.com; Richard Hunsaker (rhunsaker@heyloyster.com); Barry Noeltner (bnoeltner@heyloyster.com); Alisha L. Biesinger (abiesinger@heyloyster.com); Brad Elward; Joel Rohlf  
**Subject:** For today's call - Privileged/Confidential/Work Product/Joint Defense/Common Interest Doctrine  
**Attachments:** Appeal Qs and Strategy Going Forward.docx  
**Categories:** Profiled

Good morning all,

Please see the attached document of issues, questions, proposed strategy, action plan, and related re: the TRO. This frames our discussion for today's call. Please pardon the early-morning musing nature of the document (and the formatting – I've been fighting Word all morning).

Brad – please pay particular attention to sections A (Issues/Questions re TRO/Appeal) and C (Questions re TRO Order).

Richard/Barry/Alisha/Joel – please pay particular attention to section B (Litigation Strategy Going Forward) as well as sections A (Issues/Questions re TRO/Appeal) and C (Questions re TRO Order).

**One confidentiality/privilege concern I have is whether the order giving Plaintiffs "access" to all Eagle Forum property gives them access to EF servers, and therefore email accounts. As such, \*do not use\* Eagle Forum email accounts for any legal strategy-related communications. This email is sent to the personal emails of Mrs. Schlafly, John, Andy, and Ed.**

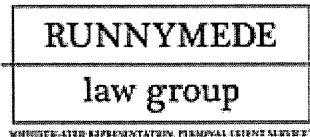
I look forward to our 10:00 call. Call in #: 951-797-1058 pin 466280

Please let me know any questions in the meantime.

**Steve**

**Stephen R. Clark**  
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